

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

KASH C. SNYDER,

Debtor.

EDWARD J. QUINLAN,

Movant,

v.

**KASH C. SNYDER and
RONDA J. WINNECOUR,
TRUSTEE,**

Respondents.

Bankruptcy No. 04-31467-JKF

Chapter 13

Doc. No.

(Related to Doc. No. 61)

**Hearing Date & Time:
March 29, 2005 at 10:30 a.m.**

DEBTOR'S RESPONSE TO MOTION TO REOPEN CASE

AND NOW, comes Kash C. Snyder, the Debtor in the above Chapter 13 Case, by and through his Counsel, Robert O Lampl and John P. Lacher and files this Response to Motion to Reopen Case as follows:

1. The averments of Motion Paragraph 1 are beyond the knowledge and information of the Debtor and thus said averments are denied and strict proof thereof is demanded.

2. The averments of Motion Paragraph 2 are admitted. By way of further answer, Movant's Counsel attended the hearing at which the Court dismissed the instant Chapter 13 Case and offered no objection to dismissal at that time.

3. The averments of Motion Paragraph 3 are admitted.

4. The averments of Motion Paragraph 4 do not require a response. To the extent a response is required, the Debtor denies that the case should be reopened. On

the contrary, the dismissal puts the parties in a position as though the case had never occurred. The Court has already granted relief from stay to the Movant in this case and the Movant purportedly proceeded with a Sheriff's Sale of real estate as a result of said relief from stay. The Court dismissed the case in the presence of Movant's Counsel who did not object and with the alleged sale of real estate having allegedly occurred, there is no reason to reopen this case.

Wherefore, it is respectfully requested that this Honorable Court deny the Movant's Motion.

Respectfully Submitted,

/s/Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
Counsel for the Debtor
960 Penn Avenue
Suite 1200
Pittsburgh, PA 15222
412-392-0330

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

KASH C. SNYDER,

Debtor.

Bankruptcy No. 04-31468-JKF

Chapter 13

EDWARD J. QUINLAN,

Movant,

Doc. No.

(Related to Doc. No. 61)

v.

**KASH C. SNYDER and
RONDA J. WINNECOUR,
TRUSTEE,**

Respondents.

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CERTIFICATE OF SERVICE

I, Robert O Lampl, hereby certify, that on the 15th day of March, 2005, I served
a true and correct copy of the foregoing **DEBTOR'S RESPONSE TO MOTION TO
REOPEN CASE** upon the following

Robert L. Murphy
Papernick & Gefsky, LLC
One Oxford Center, 34th Floor
Pittsburgh, PA 15219

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
Counsel for the Debtor
960 Penn Avenue
-Suite 1200
Pittsburgh, PA 15222
412-392-0330